evidcnce of competition in thcse markets shows that the ILECs are not engaging in price squeezes and related anti-competitive power available to them through market power in special access services, The arguments prove nothing regarding competition in the market for special access services. nor do they rebut or present any inconsistency with evidence that has been presented to the Commission that the ILECs have in fact engaged in such anti-competitive activities.

59. Even if Verizon's competition figures in downstream markets could be accepted as true, the evidence has no bearing on any conclusion that might be drawn about special *access* competition. ILECs' having the opportunity to gain market share in these markets is precisely what provides ILECs with the incentive, combined with the ability provided by their dominance over special access facilities, to engage in anti-competitive conduct. Showing the robustness of competition in those markets only indicates that, due to resulting competitive margins, non-ILEC competitors will he vulnerable over time to anti-competitive actions. And, of course, the Verizon materials show that the ILECs have been gaining market share in the long distance and ATM/Frame Relay markets, just as would he expcctcd if they were engaging in anti-competitive price squeezes and non-price discrimination against downstream competitors.[104]

60. Indeed, Verizon confirms that, for two of the largest markets, RBOCs' market share increases have been limited only by regulations lhat are disappearing monthly, and Verizon concedes that RBOCs in fact dominate the third market, for local services provided to large husinesses. Vcrizon claims that RBOCs have not yet established a significant market share in enterprise long distance and then candidly notes that "[t]he Bell Companies have only recently begun providing long distance service to business customers in some states."[105] Verizon

104. *See* Verizon Keport, at 29-30

105. *Id.*, at 2Y.

estimates that RBOCs collect "less than 15 percent of nationwide ATM and Frame Relay rcvenues" and then attributes this fact as "due to the restrictions on provision of interLATA services."[106] Vcrizon does not even attempt to minimize the RBOC share of local services for large business customers, other than to note that CLECs serve a small minority ofswitched access lines using their own facilities *or* resold ILEC lines. Blinking at reality, Verizon seeks to establish the vibrancy ofcompetition by quoting a CLEC industry group's assessment of its own members as "solid, well-tinanccd companies [ready] to compete head-to head with Bell companies."[107]

61. Verizon's market share evidence is cntirely consistent with the structure of markets vulnerable to and atfected by a monopolist's anticompetitive actions, and in fact evidence of those abuses in the special access market is widespread. AT&T has provided the Commission with pervasive evidence of non-price discrimination, particularly in the provisioning of special acccss service to competitors, and the NYPSC has documented widespread non-price practices with anti-competitive implications for markets that require RBOC special access services as an input.[108] Similarly, AT&T has documented that the RBOCs engage in classic price squeeze tactics: in niore than halfthe areas examined in a wide-ranging study, the RBOCs charged AT&T far inore for special access than charges to its retail customers for intraLATA frame relay or ATM ports — in some areas. 150% inore than a rate that would have allowed AT&T to provide a competitive offering.""'

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106. *Id.*, at 30

107. ***Id.,*** at 31-32 (quoting statement of ALTS, from Communications Daily, CLEC Industry Will Revive in 2003, Report Says (Oct. 18, 2002).

108. *See Comments of AT&T, Review of Regulatory Requirements for Incumbent LEC Broadband Telecommunications Services*, CC Docket 01-337, at 32-37 (March 1, 2002) (presenting evidence and surveying NYPSC reports).

109. ***Id..*** at 33 (citing Benway Declaration)

3. ARMIS RESULTS PROVIDE A VALID DEMONSTRATION OF SPECIAL ACCESS RATES OF RETURN THAT ARE EXCESSIVE BY ANY REASONABLE STANDARD

ARMIS data provides a ***conservative*** estimate **of RBOC** rates **of** return on Special Access **Services, and** confirms that thcse are clearly excessive by **any** reasonable **standard.**

62. Each of the RBOCs has taken exception to AT&T's use of ARMIS data to demonstrate that the RBOCs have for several years been earning excessive rates of return on special access scrvices. and that these rates ot'return are increasing at the same time as the **RBOCs** obtain greater and greater pricing Ilexibility. The RBOCs' general and specific criticisms otsuch ARMIS-based conclusions are without merit.

63. ARMIS is simply not the regulatory white elephant that the RBOCs make it out to bc. Although ARMIS has been scaled back since the onset of price cap regulation, the Commission has repeatedly resisted eliminating the core reporting requirements of the ARMIS system. The Wireline Competition Bureau's Industry Analysis Division states in "ARMIS Frequently Asked Questions' Ihat the data is used to support the Commission's analysis of broad policy issues, including the "Financial Conditions of the Industry **(How** Carriers are Doing and How Our Regulatory Programs are Working)" and "Consolidations and Mergers (Measure Changes in Productivity. Profitability, Service Quality)," as well as numerous areas offocused study, including "Rate development," "Depreciation," "Cost," "Financial Analyses," "Ratc of Return," "Trend Analysis." and "Identification ***of*** Audit Topic/Subjects."[110]

64. Moreover. even as ARMIS has been revised, the FCC has made it clear that the reporting requircmcnts support the Commission's ability to monitor the effectiveness of its regulatory policies. The Commission has repeatedly signaled that price regulation does not

110. **ARMIS FAQ.** embedded file at http:l/www.fcc.gov/wcb/armis/ (accessed 1/22/03)

make its cost accounting rules, as reported under ARMIS, obsolete."[111] The Commission has appropriately resisted the RBOCs' persistent attempts to make ARMIS a tool of deregulation rather than a regulatory tool that gets updated to reflect changes in regulatory requirements made in response to such competition as has been shown to exist.[112]

65. Each of the RBOCs advances the *possibility* that the specific allocation of costs and revenues to individual service categories, as reflected in ARMIS, *could* result in the understatement of special access costs (or the overstatement of revenues), and hence in an overstatement of rates of return on special access services. However, the RBOCs offer very few specific examples to support this claim, and the several that they do provide cannot begin to account for the very significant excess earnings levels that AT&T has calculated based upon the ARMIS data."[113] Where the RBOCs' claims have been articulated in sufficient detail to permit it, I have examined these specific criticisms and have determined that they are either (a) erroneous, (b) irrelevant to special access, (c) have an insignificant financial impact upon the special access

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111. Comprehensive Review of Accounting Requirements and ARMIS Reporting Requirements for Incumbent Local Exchange Carriers: Phase I, CC Docket 99-253, released March 8, 2000. at para. 48: "The Commission continues to require accounting and financial data about these carriers to make informed regulatory judgments on numerous policy and ratemaking issues. Furthermore, under the current regulatory price cap scheme, carriers have the ability to seek full recovery or regulated costs through low-end adjustments, as well as taking claims. Thus, our continued monitoring of the reasonableness of these costs is necessary." See also, 2000 Biennial Regulatory Review – Comprehensive Review of the Accounting Requirements and ARMIS Reporting Requirements for Incumbent Local Exchange Carriers, Phase 2, CC Docket 99-253, FCC 00-199, released November 1, 2001, at paras. 10-12.

112. See, *e.g.*, 2000 Biennial Regulatory Review of Accounting and ARMIS Requirements, supra, at para. 6: "In adopting these rule changes, we have attempted to steer a course that avoids both deregulation simply for its own sake and the countervailing temptation to retain rules that may no longer be necessary."

113. As an aside, it should be noted that the RBOCs are hardly passive recipients of the Commission's cost allocation rules. Over the years, RBOC input has worked to shape cost accounting and other reporting requirements in ways that, if anything, work to support, and not frustrate, RBOC strategic goals.

rates of return as calculated by AT&T, and/or (d) offset by other allocation adjustments that cut in the opposite direction.

66. *DSL costs and revenues.* Kahn/Taylor, BellSouth and Qwest note that most carriers include DSL revenues in ARMIS-reported special access revenues, while special access accounts are typically assigned only a fraction of the costs.[114] Qwest indicates that:

> the rules assign revenues associated with Digital Subscriber Line ("DSL") services and interstate packet switching services to the special access element, but assign a significant portion of the associated interstate costs to other elements. Taken together, these issues significantly inflate the rate-of-return numbers upon which AT&T places so much reliance.[115]

The actual impact, however, of this DSL revenue upon special access rates of return is demonstrably minor. First, SBC *does not* include DSL revenues in its special access service category.[116] As for the other **RBOCs,** the Table below excludes DSL revenues based upon Kahn/Taylor estimates, and recalculates special access rates of return with DSL revenues removed.

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114. Kahn/Taylor Decl., at 14-15; BellSouth Comments at 6; Qwest Comments at 4-5.

115. Qwest Comments, at *3.*

116. Kahn/Taylor Decl., at fn. 28.

Table 12

Estimated Interstate Special Access Costs and Revenues
By RBOC (Including GTE)
Using Kahn/Taylor DSL Revenue Assumptions
$ in Thousands

	BellSouth 2001	Qwest 2001	SBC 2001	Verizon 2001	Sum RBOC 2001
Revenues	1,853,719	$1,547,442	$4,374,967	$4,656,039	$12,432,167
Expenses	651,550	$540,240	$1,286,951	$2,564,752	$5,043,493
Net Return	751,379	$646,769	$1,928,324	$1,252,839	$4,579,311
Net investment	1,525,302	$1,407,245	$3,531,727	$5,768,191	$12,232,465
Rate of Return (%)	49.26%	45.96%	54.60%	21.72%	37.44%
Revenue Attributable to ***DSL***	$264.000	$39,689	$0	$106,311	$410,000
Rate of Return without DSL	31.95%	43.14%	54.60%	19.88%	34.08%

Source: ARMIS Table 43-01. Accounts 1090, 1190, 1910, 1915. Revenue figures are based on Kahn/Taylor assertion that total DSL revenues in 2001 for BellSouth, Verizon and Qwest were $410 million (Kahn/Taylor, at 15). BellSouth DSL revenue figures from the BellSouth 2001 Annual Report. Verizon and Qwest figures are estimates based on proportion of each company's DSL subscribers and residual revenues from the Kahn/Taylor revenue figure after removal of BellSouth revenues. As noted by Kahn/Taylor, SBC DSL revenues are not included in special access ARMIS data, and therefore have not been removed.

67. Removing all DSL revenues for all RBOCs claiming to book those revenues to special access accounts reduces the special access rates of return by about 3.3%. Total RBOC return on special access services, **per ARMIS,** would decrease from 37.44% to 34.08% ***if DSL revenues are removed*** but without any other adjustments. This estimate, however, is likely to be highly conservative (i.e., to understate the residual special access rates of return) since, as explained below, it is also likely that at least some, perhaps even most, DSL investment and associated expenses are *also* included in special access accounts. Indeed, BellSouth has specifically noted *that it assigns* DSLAM circuit investment to special access, confirming the conservative nature

of this estimate.[117] Inasmuch as Kahn/Taylor's DSL revenue figure of $410-million is unsupported and refers only to 2001 revenues, I have prepared an additional estimate of special access rates of return without DSL revenues, using verifiable sources. Table 12 below contains rate of return calculations employing alternate estimated DSL revenues.

117. BellSouth Comments, at fn. 6.

Table 13

Estimated interstate Special Access Costs and Revenues
By RBOC (Including GTE)
$ in Thousands

	BellSouth		Qwest		SBC		Verizon		Sum RBOC	
	2000	2001	2000	2001	2000	2001	2000	2001	2000	2001
Revenues	1,233,259	1,853,719	$1,226,147	$1,547,442	$3,405,544	$4,374,967	$3,718,755	$4,656,039	$9,583,705	$12,432,167
Expenses	494,806	651,550	$517,281	$540,240	$1,374,033	$1,286,951	$2,387,030	$2,564,752	$4,773,150	$5,043,493
Net Return	458,996	751,379	$452,893	$646,769	$1,261,469	$1,928,324	$793,275	$1,252,839	$2,966,633	$4,579,311
Net investment	1,247,668	1,525,302	$1,181,070	$1,407,245	$2,919,756	$3,531,727	$5,102,557	$5,768,191	$10,451,051	$12,232,465
Rate of Return (%)	36.79%	49.26%	38.35%	45.96%	43.20%	54.60%	15.55%	21.72%	28.39%	37.44%
Revenue Attributable to DSL	$51,600	$183,456	$88,193	$159,197	$0	$0	$143,280	$377,622	$283,073	$720,275
Rate of Return without DSL	32.65%	37.23%	30.88%	3465%	43.20%	54.60%	12.74%	15.17%	25.68%	31.55%

68. Using this alternative analysis, the special access rate of return drops by slightly less than 6% for 2001 (and less than 3% tor 2000). Nevertheless, the RBOCs still enjoyed rates of return on special access services above 30% which, ***by uny conventional standard*** — and especially during the current economic downturn — is indicative of supracompetitive earnings arising through the RBOCs' exercise of inarket power. While BellSouth, Qwest and Kahn/Taylor may attempt tu muddy the water by raisin:, the "DSL issue," even the "worst case scenario" — where all DSL rcvcnues are included and all DSL. costs are excluded — cannot "explain" the persistently excessive rates of return that prevail with respect to special access services.[118]

69. Significantly, while the RBOCs inay *claim* that DSL investments and expenses are not hcing allocated to special acccss, rcccnt investment trends tend to suggest otherwise. **As** the lollowing table confirms, between 1996 and 2001, **KBOC:** (including CTE) special access investinents grew lroni $5.7-billion to inore than $12.2-billion. **By** comparison, most other categories **of** RBOC interstate investment rcinained largely unchanged over the corresponding time frame, aiid intrastate investments actually ***decreased*** by nearly $10-billion. Given the rapid growth of DSL and the high capital costs that have been ascribed to its deployment, it is difficult to iinagine any other explanation for the more than doubling of special access investment while all other categories remained essentially the same or even decreased, if DSL is *not* included within

118. In several other proceedings before the Commission, the RBOCs have sought to portray the market lor DSL as so highly coinpetitivc as to justify regulatory forbearance, if not outright deregulation. See, e.g. *SBC Petition for Expedited* ***Ruling*** *that it* ***is Non-Dominant in its Provision*** *of Advanced* ***Services*** *and for* ***Forbearance*** *from Dominant* ***Carrier Regularion of*** *Those Services,* CC Docket No. 01-337, SBC Petition, October 3, 2001. Their experts have suggested that the highly competitive nature of the "high-speed Internet access market," wherein DSL competes with cable modem services. has placed the **RBOCs** in a non-dominant position and, in fact, has not even permitted them to recover the costs of providing ADSL services, which are **put** as high as $86 per month. See, Declaration of Robert W. Crandall and J. Gregory **Sidak,** filed as Attachment **A** in the above petition, at 51. It would seem that, in the various "broadband" proceedings, DSI. is actually being provided at a loss, whereas in the instant docket DSL is portrayed as being so enormously profitable that it is pushing up special access returns to supracompetitive levels. At the very least. these DSL stories ***du jour*** demand careful scrutiny.

those special access investments. And, of course, if DSL costs *are* being included in the ARMIS data for special access, then it is certainly appropriate to also include corresponding DSL revenues, as had been done in the Friedlander declaration filed with AT&T's Petition.[119] Accordingly, the figures provided by AT&T for special access rates of return — which in some cases exceeded 50% — have in no sense been impeached by the RBOC experts.

70. *Mismatch between allocation of expenses and revenues for **marketing**.* Verizon claims that "marketing expenses are allocated across all access categories, but that the associated revenues are recovered from common line and special access."[120] This claim is unfounded. Prior to price cap regulation, marketing expenses were allocated to and recovered from all interstate services in proportion to the investments assigned by the Part 69 cost allocation rules. The Commission's May 1997 *Access **Reform Order*** retained the assignment of marketing costs to special access and interexchange services that are marketed to retail customers, but removed marketing from switched access elements (by reducing the price cap indices for the common line, traffic sensitive, and trunking baskets) sold exclusively on a wholesale basis.[121] Neither this change, nor any subsequent Commission action, has diminished the level of marketing expenses recovered from special access rates.[122]

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119. Declaration of Stephen Friedlander on Behalf of AT&T Corp., RM 10593, October 15, 2002.

120. Verizon Comments, at 22.

121. *Access Charge Reform*, First Report and Order, FCC 97-158, released May 16, 1997, para. 323.

122. **As** another example of a category-specific ARMIS cost-revenue mismatch, Verizon mentions that "amounts collected for universal service recovery are booked as common line revenues, while amounts due to USAC [Universal Service Administrative Corporation] are recorded in the interexchange category." Verizon Comments at 22, fn. 50. However, neither the costs nor the revenues in question have any impact upon special access and, thus, Verizon's example is completely irrelevant to the matter at hand.

71. *Packet switching costs not in special access.* Qwest claims that packet switching costs incurred ***to*** provide certain special access services (Frame Relay, **ATM)** are assigned to the general switching category, and not to special access.[123] However, Qwest does not quantify the amount of costs that it claims are misallocated. Moreover, **Qwest** neither claims nor makes any effort to establish in its comments that revenues associated with the switching functions used to provide frame relay and ATM services are not also being retlected in one ofthe several different switching ***revenue*** accounts identified in Part 32. Put simply, Qwest has failed to demonstrate any mismatch, inasmuch as it has tocused solely upon the assignment of *costs* and not addressed the trcatmcnt of'thc corresponding ***revenues.*** The Commission thus has no basis to evaluate the validity or iinportancc ofcriticisms such as this one, when the RBOCs, which have by far the best access ***to*** the underlying information, present only their contentions hut with no facts or spccitics to back them up.

72. *Secondary and tertiary expenses*: Finally, Qwest complains that because carriers are required to assign secondary and tertiary expenses in proportion to the primary investments assigned to a category, any potential underallocation of primary investments to special access would bc exacerbated. However, this is merely another theoretical argument. **As** discussed above, the RBOCs have simply not established that primary investments are not being properly assigned to the special access category. Moreover, the magnitude of these secondary and tertiary cxpcnses is simply not large enough to offset to any significant extent the RBOCs' substantial overearning tor the special access scrvices.

73. It is also worth recalling that **ARMIS** costs are *embedded* costs, which are generally higher than forward-looking incremental costs (i.e., TELRIC). If forward-looking costs of

123. Qwest Comments, at 12

special access were substituted for the embedded costs from ARMIS, the resulting rates of return on forward-looking investment levels would be even higher.

74. In fact, while the RBOCs' service examples fail to show that ARMIS underallocates costs to special access services (or overstates the appropriate revenues), historical experience and costing trends actually support precisely the opposite conclusion. The RBOCs have a poor track record for maintaining accurate records of their network investments, particularly as to the removal of plant no longer in service. The Commission's 1999 audit reports of RBOCs' continuing property records found that these carriers could not account for approximately $5-billion in central office equipment that remained on their books.[124] If similar record-keeping practices exist with respect to special access investments, it is likely that the RBOCs' regulatory books of account also include costs for facilities that are no longer in service. The continuing property records audits also demonstrated that the nature of the record-keeping errors was consistently biased toward ***including*** items that should have been excluded, rather than the other way around. Accordingly, it is far more likely that the embedded investment costs recorded in ARMIS represent an ***overstatement*** of actual plant in service, thereby further contributing to the highly conservative character of the Friedlander ROR figures.

75. The consistent upward trend in the RBOCs' rates of return for special access also tends to belie their objections regarding the reliability of the ARMIS data. Even if there are allocation errors in ARMIS, the RBOCs have offered no evidence to suggest that whatever misallocations might actually be present, if any, are anything other than consistent from year to year. The presence of any systematic bias in the data may impact the accuracy of individual data points,

124. *1998 Biennial Regulatory Review – Review of Depreciation Requirements for Incumbent Local Exchange Carriers; Ameritech Corporation Telephone Operating Companies' Continuing Property Records Audit, et. al., GTE Telephone Operating Companies Release of Information Obtained During Joint Audit,* CC Dockets 98-137 and 99-117, AAD File No. 98-26, released April 3, 2000, FCC 00-119, at para. 15.

but as long as the misallocation bias is systematic over time, the trends revealed through an examination of multiple years' results will still provide an accurate picture of ongoing market dynamics. Although there *is* inevitably some subjectivity involved in allocating costs that cannot he directly assigned, the methodology itself, and hence the resulting allocations, do not fluctuate significantly from year to year. Thus, if competition for special access services were actually constraining prices as the RBOCs contend, the ROR for special access would tend to decrease over time. But in fact it is actually *increasing*, suggesting not only that price-constraining competition is not present, but that the extent of ongoing KUOC market power with respect to these services is growing.

76. Finally, suddenly *relying* upon ARMIS data, Kahn and Taylor have contended that the average rcvcnuc per line for spccial access has actually been decreasing "by more than 1% per year" during the 1996-2001 pcrind. My own rcvicw of the data suggests errors in the Kahn/Taylor analysis. Based upon replicable ARMIS data, the average revenue per line, decreased by only two-tenths of one percent over the entire period (a reduction in average annual revenue per line of only $0.33). **As I** will discuss in more detail below, use of an average annual revenue per line calculated using DS-O equivalents is seriously tlawed, but even accepting the flawed Kahn/Taylor evidcnce, the data proves, rather than disproves AT&T's allegations. **AI** page 16 of the Kahn/Taylor declaration, a figure appears entitled "RBOC Special Access Revenue per Special Access Line". Even a cursory review of that Figure reveals declining revenue per line amounts occurred during the period 1997-2000 — when the special access rates were still generally subject to price caps and the x-factor-driven annual reductions associated therewith — and that there has been a total reversal *of* that trend (recouping virtually all of the reductions during the prior four years) in the RBOCs' revenucs for 2001 — the first full year during which any of the RBOCs had pricing flexibility for Special Access Services.[125]

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125. BellSouth, the first KBOC to apply for and be granted pricing flexibility, approved

(continued...)

77. Moreover, assuming (as Kahn and Taylor do) for sake of argument that the analysis of an average "revenue" per line based upon DS-0 equivalents has any validity, then one should be able to examine the average "investment" and average "expense" per line as well. **As** Table 14 below reveals, during the 1996 to 2001 period in which average revenue per line declined by *only two tenths* ofpercent, average investment and average expense per line each declined by almost half. Review of those "average" per line results for those three categories more than proves AT&T's initial point. During the 1996 to 2001 period, while the average revenue per line dropped only $0.33 from $157.00 to $156.67. the average expense per line dropped **by *$59.78,*** from $123.33 to 563.55, and the average investment per line dropped by $103.45, from $257.50 to $154.05. Overall, the results demonstrate that by 2001, the net return, per DS-0 equivalent access line had climbed by more than 185%, from the $20.79 **of** 1996, to $57.76.

Table 14

Interstate Special Access Costs and Revenues
RBOC Totals (Including GTE)

	1996	1997	1998	1999	2000	2001	Change 1996-2001
(a) Revenues (000)	$3,464,545	$4,312,543	$5,536,133	$7,141,094	$9,591,843	$12,450,913	259.4%
(b) Expenses (000)	$2,721,599	$3,275,870	$3,404,629	$3,988,276	$4,780,293	$5,050,329	85.6%
(c) **Net** inveslment (000)	$5,682,447	$5373.074	$7,149,582	$8,440,569	$10,462,621	512,242,494	115.4%
(d) Net return	$445,552	$617,253	$1,279,675	$1,906,740	$2,967,064	$4,590,506	930.3%
(e) Rate of **Return** (d/c)	7.8%	9.7%	17.9%	22.6%	28.4%	37.5%	378.2%
(9 Special **Access** Lines	22,067,774	26,260,133	33,999,156	48,708,169	65,451,767	79,470,270	260.1%
(g) Revenues per line (a/f)	$157.00	$164.22	$162.83	$146.61	$146.55	$156.67	-0.2%
(h) Expenses per **line** (b/f)	$123.33	$124.75	$100.14	$81.88	$73.04	$63.55	-48.5%
(I) Investment per line (c/f)	$257.50	$242.69	$210.29	$173.29	$159.85	$154.05	-40.2%
(j) Net return per line (d/f)	$20.19	$23.51	$37.64	$39.15	$45.33	$57.76	186.1%

Sources of data:
Financial data from ARMIS 43-01, Column S, Rows 1090, 1190, 1910,1915, and 1920.
Lines are counted in terms **of** voice-grade equivalents. from ARMIS 43-08, **row** 910, **columns K** and L.

125. (...continued)
authority at the end of 2000. BellSouth Petition for Pricing Flexibility for Special Access and Dedicated Transport Services, CCB/CPD No. 00-20, Memorandum Opinion and Order, 15 FCC Rcd 23588, (Dec. 15, 2000).

78. Moreover, translating ARMIS data into DS-0 equivalent lines, as Kahn and Taylor have done. results in a flawed analysis. It is highly likely that the higher-capacity special access services, at the DS-3 and OCn levels, have experienced disproportionately greater growth than low-capacity DS-0 and DS-1 scrvices. Since the effective price per DS-0 equivalent channel is lower in these higher capacity services, their likely disproportionate growth readily explains the apparent drop in DS-0 equivalent price levels (revenue per line). The more appropriate coinparison. *of* course, is a like-for-likc price change for the *same* capacity service. And as Tables 1 through **4** above clearly demonstrate, those prices in areas subject to Phase II pricing llexihility have been on the rise over the period Since pricing flexibility became effective.

Performance data reported **under ARMIS shows** continuing problems in **special** access service **quality.**

79. Finally, in their declaration, Kahn and Taylor **lake** issue with AT&T's observation that the RBOCs are not being constrained by competition **to** improve the quality of their special acccss services provisioning.[126] In particular, they claim that **ARMIS** data show a steady improvement in **RBOC** spccial access service provisioning between 1996 and 2001. Kahn and Taylor'.; analysis appears to be based on trouble reports **per** voice grade equivalent line, which means that the successful provisioning of an order involving one OCn circuit offsets many unsuccessful provisionings of lower bandwidth spccial access lines. **A** more realistic picture can be obtained by looking at trouhlc reports for special access service based on the "total number of orders or circuits," as shown in ARMIS report 41-05. When these data is analyzed, the picture of consistent improvement presented by Kahn arid Taylor evaporates. **As** shown in the attached table (Attachment 2 to this Declaration). some RBOCs have done better than others. However, Ameritech, which reports by far the best performance, reports an anomalously high number of "orders or circuits" for the 2000 *io* 2001 period (three *to* four times *as* many as *in* the four prior

126. Kahn/Taylor Decl.. at 16-17

years). which could account. at least in part, for the apparent improvement in its trouble report percentages. Without these recent Ameritech numbers, RROC trouble reports as a percentage of orders or circuits rose substantially from 1998 to 2001. In any event, even a consistent record of having trouble reports on inore than half of all orders is hardly a commendable performance and is consistent with the conclusion presented by Ordover and Willig that the RBOCs are not constrained by competitive forces with respect to their service quality for special access services.

The foregoing statements are true and correct to the best of my knowledge, information and belief.

LEE L. SELWYN

Attachment 1

Statement of Qualifications

Statement of Qualifications

DR. LEE L. SELWYN

Dr. Lee L. Selwyn has been actively involved in the telecommunications field for more than twenty-five years, and is an internationally recognized authority on telecommunications regulation, economics and public policy. Dr. Selwyn founded the firm of Economics and Technology, Inc. in 1972, and has served as its President since that date. He received his Ph.D. degree from the Alfred P. Sloan School of Management at the Massachusetts Institute of Technology. He also holds a Master of Science degree in Industrial Management from MIT and a Bachelor of Arts degree with honors in Economics from Queens College of the City University of New York.

Dr. Selwyn has testified as an expert on rate design, service cost analysis, form of regulation, and other telecommunications policy issues in telecommunications regulatory proceedings before some forty state commissions, the Federal Communications Commission and the Canadian Radio-television and Telecommunications Commission, among others. He has appeared as a witness on behalf of commercial organizations, non-profit institutions, as well as local, state and federal government authorities responsible for telecommunications regulation and consumer advocacy.

He has served or is now serving as a consultant to numerous state utilities commissions including those in Arizona, Minnesota, Kansas, Kentucky. the District of Columbia, Connecticut, California, Delaware, Maine, Massachusetts, New Hampshire, Vermont, New Mexico, Wisconsin and Washington State. the Office of Telecommunications Policy (Executive Office of the President). the National Telecommunications and Information Administration, the Federal Communications Commission, the Canadian Radio-television and Telecommunications Commission, the United Kingdom Office of Telecommunications, and the Secretaria de Comunicaciones y Transportes of the Republic of Mexico. He has also served as an advisor on telecommunications regulatory matters to the International Communications Association and the Ad Hoc Telecommunications Users Committee, as well as to a number of major corporate telecommunications users, information services providers, paging and cellular carriers, and specialized access services carriers.

Dr. Selwyn has presented testimony as an invited witness before the U.S. House of Representatives Subcommittee on Telecommunications, Consumer Protection and Finance and before the U.S. Senate Judiciary Committee, on subjects dealing with restructuring and deregulation of portions of the telecommunications industry.

In 1970, he was awarded a Post-Doctoral Research Grant in Public Utility Economics under a program sponsored by the American Telephone and Telegraph Company, to conduct research on the economic effects of telephone rate structures upon the computer time sharing industry. This work was conducted at Harvard University's Program on Technology and Society. where he was appointed as a Research Associate. Dr. Selwyn was also a member of the faculty at the College of Business Administration at Boston University from 1968 until 1973, where he taught courses in economics, finance and management information systems.

Dr. Sclwyn has published numerous papers and articles in professional and trade journals on the subject of telecommunications service regulation, cost methodology, rate design and pricing policy. These have included:

"Taxes, Corporate Financial Policy and Return to Investors"
National Tux Journal, Vol. XX, No.4, December 1967.

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"Diversification, Deregulation, and Increased Uncertainty in the Public Utility Industries"
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"Assessing Market Power and Competition in The Telecommunications Industry: Toward an Empirical Foundation for Regulatory Reform"
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Presented at the 105th Annual Convention und Regulatory Symposium, National Association of'Regulatory Utility Commissioners, ***New*** *York,* Novcniher 18, 1993.

"The Potential for Competition in the Market For Local Telephone Services" (with David N. Townsend and Paul S. Keller)
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Dr. Selwyn has been an invited speaker at numerous seminars and conferences on telecommunications regulation and policy, including meetings and workshops sponsored by the National Telecommunications and Information Administration, the National Association of Regulatory Utility Commissioners, the U.S. General Services Administration, the Institute of Public Utilities at Michigan State University, the National Regulatory Research Institute at Ohio Stale University, the Harvard University Program on Information Resources Policy, the Columbia University Institute for Tele-Information, the International Communications Association, the Tele-Communications Association, the Western Conference of Public Service Commissioners, at the New England. Mid-America, Southern and Western regional PUC/PSC conferences, as well as at numerous conferences and workshops sponsored by individual regulatory agencies.

Attachment 2

Installation and Repair Intervals (Interexchange Access) — Annual

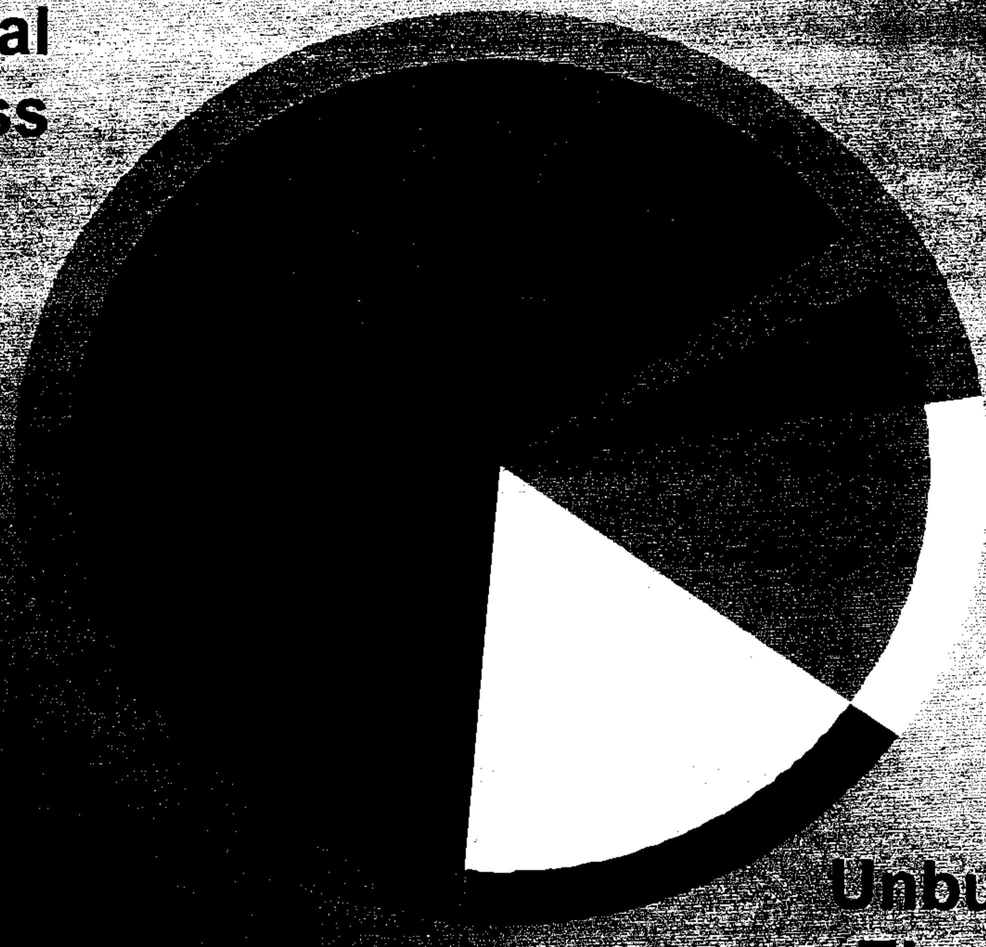
43-05 Table Ia Installation and Repair Intervals (Interexchange Acc) -Annual

Company Name	Row Title	All Special Access					
		1996	1997	1998	1999	2000	2001
BELLSOUTH	# Total Number of Orders or Circuits	86,000	106,649	145,185	127,801	178,631	194,276
BELLSOUTH	# Missed for Customer Reasons (MCR)		0	34,981	28,175	34,877	41,854
BELLSOUTH	% Commitments Met	89.18	88.46	85.14	85.12	89.66	96.27
BELLSOUTH	Average Interval (in days)	13.2	14	14.8	15.9	16.3	17.5
BELLSOUTH	# Total Trouble Reports	68,849	69,643	77,198	80,155	97,705	130,805
BELLSOUTH	% Trouble Reports	80%	65%	53%	63%	55%	67%
BELLSOUTH	Average Interval (in hours)	3.3	3.3	3.7	4.4	4.6	3.4
QWEST	# Total Number of Orders or Circuits	99,884	162,381	212,043	178,794	178,187	129,566
QWEST	# Missed for Customer Reasons (MCR)		0	27,537	70,210	87,796	60,660
QWEST	% Commitments Met	79.51	81.94	88.65	83.97	90.71	95.03
QWEST	Average Interval (in days)	14.2	20.8	22.8	23.6	21.9	15.4
QWEST	# Total Trouble Reports	89,302	96,531	95,603	111,773	120,439	120,756
QWEST	% Trouble Reports	89%	59%	45%	63%	68%	93%
QWEST	Average Interval (in hours)	5.2	3.4	4.6	4.4	3.4	2.7
SOUTHWESTERN	# Total Number of Orders or Circuits	50,727	62,966	56,419	43,594	34,917	136,614
SOUTHWESTERN	# Missed for Customer Reasons (MCR)		0	9,004	8,975	7,200	22,784
SOUTHWESTERN	% Commitments Met	80.9	80.1	97.41	97.02	94.32	86.84
SOUTHWESTERN	Average Interval (in days)	0	0	0	0	0	13.9
SOUTHWESTERN	# Total Trouble Reports	68,576	65,514	93,092	91,822	122,473	151,224
SOUTHWESTERN	% Trouble Reports	135%	104%	165%	211%	351%	111%
SOUTHWESTERN	Average Interval (in hours)	2.1	2.1	2.2	2.7	2.6	4.7
PACIFIC TELESIS	# Total Number of Orders or Circuits	58,419	66,370	59,142	135,676	80,737	90,032
PACIFIC TELESIS	# Missed for Customer Reasons (MCR)		0	15,127	24,078	16,795	13,895
PACIFIC TELESIS	% Commitments Met	93.63	89.4	89.31	74.68	69.53	74.63
PACIFIC TELESIS	Average Interval (in days)	22.6	20.8	20.1	22.3	37.3	20.7
PACIFIC TELESIS	# Total Trouble Reports	63,809	46,055	26,488	104,420	59,015	69,134
PACIFIC TELESIS	% Trouble Reports	109%	69%	45%	77%	73%	77%
PACIFIC TELESIS	Average Interval (in hours)	4.7	5	4.6	4.3	4.5	3.9
AMERITECH	# Total Number of Orders or Circuits	73,555	80,653	113,889	132,578	544,774	612,019
AMERITECH	# Missed for Customer Reasons (MCR)			21,919	20,257	36,386	26,294
AMERITECH	% Commitments Met	87.9	92.5	93.91	93.61	88.01	92.18
AMERITECH	Average Interval (in days)	19	13.1	14.6	15.7	15.6	15.3
AMERITECH	# Total Trouble Reports	41,196	40,314	40,907	31,548	28,633	64,533
AMERITECH	% Trouble Reports	56%	50%	36%	24%	5%	11%
AMERITECH	Average Interval (in hours)	3.7	3.1	3.1	3	2.9	5.8
BELL ATLANTIC	# Total Number of Orders or Circuits	73,660	246,767	236,655	208,399	206,146	207,098
BELL ATLANTIC	# Missed for Customer Reasons (MCR)		12,090	53,606	50,338	48,357	49,028
BELL ATLANTIC	% Commitments Met	77.53	96.53	94.45	84.71	82	81.19
BELL ATLANTIC	Average Interval (in days)	29.2	13	20.5	17.7	23.6	15.6
BELL ATLANTIC	# Total Trouble Reports	22,293	113,267	80,461	94,454	89,218	142,218
BELL ATLANTIC	% Trouble Reports	30%	46%	34%	45%	43%	69%
BELL ATLANTIC	Average Interval (in hours)	10.7	2.6	2.8	4.1	5.1	6
GTE CORP.	# Total Number of Orders or Circuits	57,376	60,495	47,972	56,157	65,916	83,314
GTE CORP.	# Missed for Customer Reasons (MCR)		0	16,980	28,706	22,049	13,214
GTE CORP.	% Commitments Met	92.26	89.7	89.55	90.26	84.35	96.01
GTE CORP.	Average Interval (in days)	11.52	13	21.1	21.3	28.3	22.7
GTE CORP.	# Total Trouble Reports	67,702	70,406	75,550	79,870	81,840	124,714
GTE CORP.	% Trouble Reports	118%	116%	157%	142%	124%	150%
GTE CORP.	Average Interval (in hours)	9	7	7.9	8.4	10.2	9.2
TOTAL RBOC	**# Total Number of Orders or Circuits**	**499,621**	**786,281**	**871,305**	**882,999**	**1,289,308**	**1,452,919**
TOTAL RBOC	**# Special Access Lines**	**22,067,774**	**26,260,133**	**33,999,156**	**48,708,169**	**65,451,767**	**79,470,270**
TOTAL RBOC	**# Total Trouble Reports**	**421,727**	**501,730**	**489,299**	**594,042**	**599,323**	**803,384**
TOTAL RBOC	**% Trouble Reports/Orders or Circuits**	**84%**	**64%**	**56%**	**67%**	**46%**	**55%**
TOTAL RBOC	% Trouble Reports/Lines	1.91%	1.91%	1.44%	1.22%	0.92%	1.01%
TOTAL RBOC WITHOUT AMERITECH:							
	# Total Number of Orders or Circuits	**426,066**	**705,628**	**757,416**	**750,421**	**744,534**	**840,900**
	# Total Trouble Reports	**380,531**	**461,416**	**448,392**	**562,494**	**570,690**	**738,851**
	% Trouble Reports	**89%**	**65%**	**59%**	**75%**	**77%**	**88%**

ATTACHMENT 3

Wholesale Revenue Profile

Over $9B in 2002 revenue



ATTACHMENT 4

MSAs With Full Pricing Flexibility for Special Access (Phase II Flexibility)

AKRON OH
ALBUQUERQUE NM
ANCHORAGE AK
AUSTIN-SAN MARCOS TX
BELLINGHAM WA
BINGHAMTON NY
BOISE CITY ID
CHAMPAIGN-URBANAIL
CHARLESTON WV
COLORADO SPRINGS CO
CORPUS CHRISTI TX
DAVENPORT-MOLINE-ROCK ISLAND(IA-IL) - IA
DECATUR IL
DES MOINES IA
DOVER DE
DUBUQUE IA
EUGENE-SPRINGFIELD OR
FARGO-MOORHEAD(ND-MN) - MN
FARGO-MOORHEAD(ND MN) ND
FLINT MI
FORT WAYNE IN
GRAND RAPIDS-MUSKEGON-HOLLAND MI
HAGERSTOWN MD
HOUSTON TX
IOWA CITY(IA)
KANSAS CITY (MO-KS) - KS
KANSAS CITY (MO-KS) - MO
LITTLE ROCK-NORTH LITTLE ROCK AR
LYNCHBURG(VA)
MADISON WI
MEDFORD-ASHLAND OR
MEDFORD-ASHLAND(OR)
MILWAUKEE-WAUKESHA WI
NEWARK NJ
NORFOLK-VIRGINIA BEACH-NEWPORT NEWS (VA-NC) - VA
OKLAHOMA CITY OK
OLYMPIA WA
OMAHA (NE-IA) - NE
OMAHA(NE-IA) - IA
PARKERSBURG-MARIETTA(WV-OH) - WV
PHOENIX-MESA AZ
PORTLAND-VANCOUVER (OR-WA) - WA
PORTLAND-VANCOUVER (OR-WA) -OR
READING(PA)
RICHMOND-PETERSBURG VA
ROANOKE(VA)
ROCHESTER(MN)
ROCKFORD(IL)
SALT LAKE CITY-OGDEN UT
SAN ANGELO(TX)
SAN ANTONIO TX
SAN JOSE CA
SPOKANE WA
SPRINGFIELD IL
ST. CLOUD(MN)
ST. LOUIS (MO-IL) - MO
STAMFORD-NORWALK CT
TOPEKA KS
TULSA(OK)
VINELAND-MILLVILLE-BRIDGETON(NJ)
WILLIAMSPORT PA
WILMINGTON-NEWARK (DE-MD) - DE
WILMINGTON-NEWARK(DE-MD) - MD
YAKIMA(WA)

MSAs with Partial Pricing Flexibility for Special Access (Phase I)

ALBANY-SCHENECTADY-TROY NY
ALLENTOWN-BETHLEHEM-EASTON PA
ALTOONA(PA)
AMARILLO TX
ATLANTA GA
BALTIMORE MD
BATON ROUGE(LA)
BILOXI-GULFPORT-PASCAGOULA(MS)
BOSTON (MA-NH) - MA
BOSTON(MA-NH) - NH
BRIDGEPORT CT
BUFFALO-NIAGARA FALLS NY
BURLINGTON(VT)
CHARLOTTE-GASTONIA-ROCK HILL (NC-SC) - NC
CHATTANOOGA (TN-GA) - TN
CHICAGO IL
CINCINNATI (OH-KY-IN) - OH
COLUMBUS OH
DALLAS TX
DAYTONA BEACH(FL)
DAYTON-SPRINGFIELD OH
DENVER CO
DETROIT MI

ERIE(PA)
EVANSVILLE-HENDERSON(IN-KY)- IN
FORT COLLINS-LOVELAND(CO)
FORT WORTH-ARLINGTON TX
GAINESVILLE FL
GREELEY(CO)
GREENSBORO--WINSTON-SALEM--HIGH POINT NC
HARRISBURG-LEBANON-CARLISLE(PA)
HARTFORDCT
HONOLULU HI
HUNTINGTON-ASHLAND(WV-KY-OH) - WV
INDIANAPOLIS IN
JACKSON(MS)
JACKSONVILLE FL
KALAMAZOO-BATTLE CREEK MI
KNOXVILLE TN
LAKE CHARLES(LA)
LAKELAND-WINTER HAVEN FL
LANCASTER(PA)
LOS ANGELES-LONG BEACH CA
LOUISVILLE (KY-IN)- KY
LUBBOCK(TX)
MANCHESTER (NH) - NH

MELBOURNE-TITUSVILLE-PALM BAY FL
MEMPHIS (TN-AR-MS) - TN
MIAMI FL
PAUL (MN-WI) - MN
MONROE(LA)
MONTGOMERY(AL)
NASHVILLE TN
NEW YORK NY
NORFOLK-VIRGINIA BEACH-NEWPORT NEWS(VA-NC) NC
ORLANDO FL
PENSACOLA(FL)
PHILADELPHIA (PA-NJ) - NJ
PHILADELPHIA (PA-NJ) -PA
PITTSBURGH PA
PORTLAND(ME)
PORTSMOUTH-ROCHESTER (NH-ME) - NH
PORTSMOUTH-ROCHESTER([illegible]-ME) - ME
PROVIDENCE-FALL RIVER-WARWICK (RI-MA) - RI
PROVO-OREM UT
PUEBLO(CO)
RALEIGH-DURHAM-CHAPEL HILL(NC)
SACRAMENTOCA
SALEM OR

MSAs with Partial Pricing Flexibility for Special Access (Phase I)

SAN DIEGO CA
SAN FRANCISCO CA
SANTA BARBARA-SANTA MARIA-LOMPOC(CA)
SARASOTA-ERADENTON FL
SAVANNAH(GA)
SCRANTON--WILKES-BARRE--HAZLETON(PA)
SEATTLE-BELLEVUE-EVERETTWA
SHREVEPORT-BOSSIER CITY(LA)
SIOUX CITY IA-NE
SIOUX CITY(IA-NE) - NE
SPRINGFIELD MA
SPRINGFIELD MO
STATE COLLEGE(PA)
SYRACUSE(NY)
TACOMA WA
TAMPA-ST. PETERSBURG-CLEARWATER FL
TOLEDO OH
TUCSON AZ
WASHINGTON (DC-MD-VA-WV) - VA
WASHINGTON (DC-MD-VA-WV) -MD
WASHINGTON DC-MD-VA-WV . DC PROPER
WATERLOO-CEDAR FALLS(IA)
WEST PALM BEACH-BOCA RATON FL
WILMINGTON NC
WORCESTER(MA-CT) - MA

MSAs Without Pricing Flexibility

ABILENE TX
ALBANY GA
ALEXANDRIA(LA)
ANN ARBOR(MI)
ANNISTON(AL)
APPLETON-OSHKOSH-NEENAH WI
ASHEVILLE NC
ATHENS(GA)
ATLANTA(GA)
ATLANTIC-CAPE MAY(NJ)
AUGUSTA-AIKEN GA-SC
BAKERSFIELD(CA)
BANGOR ME
BARNSTABLE-YARMOUTH(MA)
BEAUMONT-PORT ARTHUR TX
BENTON HARBOR(MI)
BERGEN-PASSAIC NJ
BILLINGS(MT)
BINGHAMTON(NY)
BIRMINGHAM AL
BISMARCK(ND)
BLOOMINGTON-NORMAL(IL)
BOISE CITY(ID)
BOULDER-LONGMONT CO
BLOOMINGTON(IN)
BRAZORIA(TX)
BREMERTON(WA)
BROCKTON MA
BROWNSVILLE-HARLINGEN-SAN BENITO(TX
BRYAN-COLLEGE STATION TX
CANTON-MASSILLON OH
CASPER(WY)
CEDAR RAPIDS(IA)
CHARLESTON-NORTH CHARLESTON SC
CHARLOTTE-GASTONIA-ROCK HILL(NC-SC)
CHARLOTTESVILLE(VA)
CHATTANOOGA(TN-GA)
CHEYENNE WY
CHICAGO(IL)
CHICO-PARADISE(CA)
CINCINNATI(OH-KY-IN)
CLARKSVILLE-HOPKINSVILLE(TN-KY)
CLEVELAND-LORAIN-ELYRIA OH
COLUMBIA(MO)
COLUMBIA(SC)
COLUMBUS GA-AL
COLUMBUS(OH)
CORVALLIS OR
CUMBERLAND MD-WV
DANBURY CT
DANVILLE(VA)
DAVENPORT-MOLINE-ROCK ISLAND IA-IL
DECATUR(AL)
DOTHAN(AL)
DUBUQUE(IA)
DULUTH-SUPERIOR(MN-WI)
DUTCHESS COUNTY NY
EAU CLAIRE WI
EL PASO TX
ELKHART-GOSHEN(IN)
ELMIRA(NY)
ENID(OK)
EVANSVILLE-HENDERSON(IN-KY)
FAYETTEVILLE(NC)
FAYETTEVILLE-SPRINGDALE-ROGERS(AR)
FITCHBURG-LEOMINSTER(MA)
FLAGSTAFF(AZ-UT)
FLORENCE SC
FLORENCE(AL)
FORT LAUDERDALE FL
FORT MYERS-CAPE CORAL(FL)
FORT PIERCE-PORT ST. LUCIE(FL)
FORT SMITH AR-OK
FORT WALTON BEACH FL
FRESNO(CA)
GADSDEN(AL)
GALVESTON-TEXAS CITY(TX)
GARY(IN)
GLENS FALLS(NY)
GOLDSBORO(NC)
GRAND FORKS(ND-MN)
GRAND JUNCTION(CO)
GREAT FALLS(MT)
GREEN BAY(WI)
GREENSBORO--WINSTON-SALEM--HIGH POINT(NC)
GREENVILLE NC
GREENVILLE-SPARTANBURG-ANDERSON SC
HAGERSTOWN(MD)
HAMILTON-MIDDLETOWN(OH)
HATTIESBURG(MS)
HICKORY-MORGANTON-LENOIR(NC)
HOUMA(LA)
HUNTINGTON-ASHLAND(WV-KY-OH)
HUNTSVILLE AL
JACKSON(MI)
JACKSON(TN)
JACKSONVILLE(NC)
JAMESTOWN(NY)
JANESVILLE-BELOIT(WI)
JERSEY CITY NJ
JOHNSON CITY-KINGSPORT-BRISTOL(TN-VA)
JOHNSTOWN(PA)
JONESBORO(AR)
KANKAKEE(IL)

MSAs Without Pricing Flexibility

KENOSHA WI
KILLEEN-TEMPLE(TX)
KOKOMO(IN)
LA CROSSE(WI-MN)
LAFAYETTE LA
LAFAYETTE(IN)
LANSING-EAST LANSING MI
LAREDO(TX)
LAS CRUCES(NM)
LAS VEGAS NV-AZ
LAWRENCE MA-NH
LAWRENCE(KS)
LAWTON(OK)
LEWISTON-AUBURN(ME)
LEXINGTON KY
LIMA OH
LINCOLN(NE)
LONGVIEW-MARSHALL TX
LOUISVILLE(KY-IN)
LOWELL MA-NH
MACON GA
MANSFIELD(OH)
MCALLEN-EDINBURG-MISSION(TX)
MEMPHIS TN-AR-MS
MERCED(CA)
MIDDLESEX-SOMERSET-HUNTERDON NJ
MINNEAPOLIS-ST. PAUL(MN-WI)
MOBILE AL
MODEST0 CA
MONMOUTH-OCEAN NJ
MUNCIE(IN)
MYRTLE BEACH(SC)
NAPLES(FL)
NASHUA NH
NASSAU-SUFFOLK NY
NEW BEDFORD(MA)
NEW HAVEN-MERIDEN CT
NEW LONDON-NORWICH(CT-RI)
NEW ORLEANS(LA)
NEWBURGH(NY-PA)
OAKLAND CA
OCALA(FL)
ODESSA-MIDLAND(TX)
ORANGE COUNTY CA
OWENSBORO(KY)
PANAMA CITY(FL)
PARKERSBURG-MARIETTA(WV-OH)
PEORIA-PEKIN(IL)
PINE BLUFF(AR)
PITTSFIELD(MA)
POCATELLO(ID)
PROVIDENCE-FALL RIVER-WARWICK(RI-MA)
PUNTA GORDA(FL)
RACINE WI
RAPID CITY(SD)
REDDING(CA)
RENO NV
RICHLAND-KENNEWICK-PASCO(WA)
RIVERSIDE-SAN BERNARDINO CA
ROCHESTER NY
ROCKY MOUNT(NC)
SAGINAW-BAY CITY-MIDIAND MI
SALEM(OR)
SALINAS CA
SAN LUIS OBISPO-ATASCADERO-PASO ROBLES(CA)
SANTA CRUZ-WATSONVILLE(CA)
SANTA FE(NM)
SANTA ROSA CA
SAVANNAH(GA)
SHARON(PA)
SHEBOYGAN(WI)
SHERMAN-DENISON(TX)
SIOUX CITY(IA-NE)
SIOUX FALLS(SD)
SOUTH BEND IN
SPOKANE(WA)
ST. JOSEPH(MO)
ST. LOUIS MO-IL
STEUBENVILLE-WEIRTON O H - W
STOCKTON-LODI CA
SUMTER(SC)
TALLAHASSEE FL
TERRE HAUTE IN
TEXARKANA(TX-AR)
TRENTON NJ
TUSCALOOSA(AL)
TYLER(TX)
UTICA-ROME(NY)
VALLEJO-FAIRFIELD-NAPA C A
VENTURA(CA)
VISALIA-TULARE-PORTERVILLE(CA)
WACO TX
WASHINGTON(DC-MD-VA-WV)
WATERBURY CT
WAUSAU(WI)
WHEELING W - O H
WICHITA FALLS(TX)
WICHITA KS
YOLO(CA)
YORK(PA)
YOUNGSTOWN-WARREN OH
YUBA CITY(CA)
YUMA(AZ)